GATEWAY PACIFIC COAL TERMINAL (GPCT)
Environmental Impact Study: Scope Requests Related to Bellingham, WA
November 24, 2012

I have read the GPCT key facts online report regarding trains and traffic and the Save Our San Juan Islands handbill. I believe when all the studies are finished, Bellingham, WA will be the unbeatable choice because it is the only natural deep-water harbor access on Pacific coast, least distance from coal fields and least population for trains to pass. So to help create an all-encompassing scope for the EIS, I submit the following

SHIPPING COAL SAFELY THROUGH THE SALISH SEA

The Save Our San Juan Islands handout states 974 coal ships per year. Already, a tug boat is stationed at Neah Bay, west of Port Angeles, WA, for escorting oil-laden ships from the mouth of the Strait of Juan de Fuca to the Anacortes, WA refinery. This tug boat operation should probably be expanded to at least four operational tugs plus one more for back-up to escort ALL movements of coal ships between the mouth of the Strait of Juan de Fuca to the terminal. The use of escort tugs should bring peace with the local environmentalists because it did with movement of oil-laden ships within these waters. Having an overnight sleeping facility for not more than two tug crews may be necessary at Cherry Point.

BASIS OF OBSERVATIONS FOR THIS WRITING

Current public planned operation is 18 1.5-mile trains are being considered to haul all the coal at 9 trains each way per day. There was no indication of additional trains in the future but 8 more trains per day are included to cover that possible expansion for a potential 26 trains per day, 13 trains each way.

US Dept of Transportation is looking into some sort of high speed passenger trains plus increased frequency passenger trains between Bellingham and Portland. I suspect high speeds at 100-120mph on existing tracks and not the 220mph train on exclusive track coming to California hoping to start construction December 2012.

Per recent report regarding proposed basketball/ice hockey arena discussion, Port of Seattle is expecting to expand its personnel either by or to 100,000 within a defined timeframe to meet future shipping requirements resulting with significant increase in traffic east through the Stevens Pass/Cascade Tunnel and south towards Portland.

Cascade Tunnel with its traffic through Stevens Pass and the line to Portland both appear essentially single-rail operations with Stevens Pass appearing more single-rail than Seattle-Portland.

Pendleton, OR and Wenatchee, WA already have operating rail road support facilities.

GPCT website states current Washington rail system is nearing saturation.

GPCT website states the 35mph train will take 6-7 minutes to pass. With train lines surrounded by closely built structures in historical communities and slow speed operations, commencement of higher speed coal and freight trains through these communities on existing rights-of-way is impossible.

The Seattle-Everett track is aligned beside the base of a sandy cliff for several miles. These tracks are often closed enough times per year due to landslides during periods of heavy rainfall to affect coal transport schedules, to wit: This line was closed beyond 24 hours the week of November 18, 2012 for landslide repair.

Seattle experiences heavy rainfall approximately 7 months a year and the Seattle-Everett tracks are closed due to mudslides and landslides for more than 24 hours approximately 5 times a year.

Regarding some community concerns:

a. Seattle, Edmonds and mudslide concerns are eliminated if coal trains used Stevens Pass exclusively.

b. Marysville will require at least one separation that crosses both the railway and I-5 (a block apart) as one overhead crossing with new access roads to permit uninterrupted 24 hour emergency vehicle passage across the tracks with first crossing no sooner than about 2 blocks north of main east-west street of town where I-5 finishes returning from elevated to surface-level roadway.

c. I have not been to Stanwood to make an observation.

d. All Mount Vernon concerns are removed with a new double track railway passing to west side of town starting from below town northward to beyond Cook Rd. Current track passes through downtown and immediately next to I-5 which is at base of mountain side providing no downtown bridging capacity and uninterrupted access to local hospital from downtown.

e. All Burlington concerns are remedied by continuing the new railway at west side of Mount Vernon north to beyond Cook Rd.

f. Bellingham. I understand the water in Bellingham gets very deep, very quickly. It appears a tunnel may be necessary: shortest unobstructed distance through town, right-of-way acquisition plus constructing a new line through the city and noise containment may make the difference acceptable.

Save for Stanwood, all communities from Seattle and northward have been addressed by the above.

The project display boards at the November 2012 Friday Harbor, WA meeting showed minimal holding area for coal trains so the appearance is planning a Just-In-Time delivery operation with immediate terminal exit which means the coal trains will be on very tight schedules.

PROPOSED EIS CONSIDERATIONS

The EIS needs inclusion of the high speed rail study's projection of required service needs regarding lead clearance of the trains the US Dept of Transportation is proposing between Portland and Bellingham. Expectation is the mix of that number of miles, proposed increase of traffic to/from the greater Puget Sound ports plus your coal trains—which will probably include a priority as well to prevent the coal trains from collecting on side tracks—will surely result in a required double rail service from either Everett or Vancouver, WA to Bellingham. US Dept of Transportation may help with design and construction grants to help move along their project.

EIS will need to address enough holding track to accommodate the number of northbound trains expected from Wyoming/Montana to Seattle when the Seattle-Everett track is impassable so track operations may continue unimpeded. Wyoming/Montana trains could continue east but the returning trains may also require long waits due to minimal holding track at the mines.

With Washington state rail system approaching saturation, it appears EIS needs to review expanding all major rail lines to double rail and which expansion provides the longest viability until resaturation.

Since Washington state rail systems dump into Idaho then Montana and into Oregon, the EIS needs to review needs for establishing continuous double rail from Washington eastward to Montana and also additional rail traffic through Oregon to Salt Lake City, Utah. It would be hard to believe with all the traffic from Chicago to Salt Lake City feeding Seattle, Portland, San Francisco, and Los Angeles that the line from Salt Lake City to any point in Wyoming is not already a minimum of double rail. EIS may need to address the potential of a third rail requirement in the Salt Lake City-Wyoming segment because traffic growth to the California cities may also affect future coal train scheduling.

To create a continuous double track service between Vancouver, WA and Bellingham, WA will be greatly expensive for an approach to Bellingham. Reducing expansion to rural areas only will have limited freight movement improvement with the EIS review needing to determine how long this double track through rural-areas only approach will take to reach saturation. Working with the US Dept of Transportation EIS review is recommended.

The coal trains will need 24-hour operation thus night noise will require EIS addressing. Construction of concrete barrier walls similar to those along federal highways in residential areas will be required in close residential areas for both sound plus safety for children and animals.

EIS needs a quick review of rebuilding the line over Snoqualmie Pass to address its inability towards helping the transportation issue. This would relieve all potential track crossing issues with the existing BSNF line over Stevens Pass during design and construction of the second line.

boring a new 8.5 mile tunnel and to create a whole new approximate 100-mile rail bed between Everett and Wenatchee with two options.

a. To Seattle via south end of Lake Washington. This option would result in the trains entering Seattle through heavy residential areas. Moreover, this track would return to the mudslide, landslide issue of unreliable access because it would require passing the cliffs between Seattle and Everett.

b. To Everett via Bellevue. This option has the Snoqualmie line diverting north using the abandoned BSNF line through Bellevue, currently being changed to a foot trail, and connect with the Stevens Pass line between Monroe and Everett. This option would surely never pass the political tests.

ALTERNATE GPT SITES

Vancouver, WA already has all rail needs already in place, quick start-up capacity and billions less expensive to prepare. This site removes the need to build a second rail through residential areas, community upheaval and essentially destruction of small communities between Portland, OR and Bellingham, WA. This site also removes constructing the proposed line between Pendleton, OR and Everett, WA which would take several years longer to reach coal terminal operation. Understand the site is next to an oil docking facility which will face fire issues. Last, this site also has the unending expense of dredging the Columbia River which will only increase annually.

RECOMMENDATION

Build a new track between Pendleton, OR and Wenatchee, WA and continue construction with a second tunnel and track over Stevens Pass to Everett, WA.

The new Everett-Pendleton line would provide:

a. 100% weather accessibility for all coal trains through Washington to Bellingham.

b. The less noise-objectionable approach for the coal trains from Vancouver to Everett.

c. Removal of all community disruption between Seattle and Portland related to the coal trains.

d. Ability to reduce freight traffic on the Seattle-Portland line by filling excess capacity with general goods trains which makes easing design of higher speed passenger service between these cities for US Dept of Transportation.

e. The least high-density exposure to coal dust for Washington and Oregon populations.

f. Political acceptability in both Washington and Oregon for the proposed Bellingham coal terminal.

g. Uninterrupted double rail capacity in and out of Puget Sound for coal and freight for decades beyond expanded-life of spotty expansion of current single rail to double rail service between communities between Seattle and Portland requiring the revisit of this very issue before end of this century.

h. Relief from facing rail transportation in/out greater Puget Sound issues for more decades than any other option which the EIS will need to calculate and present.

A cost analysis may find the expenses of fuel, engine maintenance and personnel for the additional guestimated 175 miles for Montana trains to go around the Cascades so to avoid Stevens Pass is similar to the cost of crossing Stevens Pass.

All coal trains could follow proposed GPCT plan for all coal trains to enter Puget Sound via Union Pacific rail until weather forecasts cast concern of Seattle-Everett section mudslides thus requiring redirection of all coal trains through Stevens Pass where at that time all non-coal traffic above the double track passage saturation through Stevens pass would be redirected to the Union Pacific lines.

Right-of-Way acquisition using public domain is not available because the final owner of the land would be a corporation, eventually by Hathaway Investments, which is a private firm and not with final ownership by a county, state or federal organization i.e. airport, freeway, public building—the intent of original writers of public domain law.

Sharing the second line over Stevens Pass construction cost between BSNF and GPT may be possible because all benefit from the additional second line. There also may be federal funding through infrastructure grants plus if the goal is to relieve freight use on the Portland-Seattle line, there may be funding from the high speed rail consideration to promote this concept.

MISCELLANEOUS CONCERNS

Coal dust. Norfolk and Western has two lines hauling coal from West Virginia to Norfolk via Richmond, VA with a line on both sides of the James River in Richmond. It would require a comparison of speeds as to how much dust the average train expels after so much distance but it seems the distance the trains travel before they arrive to the Richmond SMSA would find since there is no discussion of coal dust by the time the trains reach Richmond, the Seattle SMSA would find no concerned discussion of coal dust in Seattle. If the Northwest region trains travel faster than West Virginia-Virginia trains, it argues the dust from the Northwest region trains is aired long before reaching western Washington.

I look forward to any questions you may wish to ask.

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